

SSVF Operations and Compliance FAQs

Modified Service Delivery

1. As a precaution for Agency has decided to stop all face to face contacts and community work for staff. Is this allowable under SSVF Regulations?

SSVF is part of the critical social service infrastructure that must remain open and available for those in need. This needs to be done, and can be done, in a way that protects staff. Although SSVF is required to continue operations, grantees may use telework services and remote access to continue to serve Veteran families. There are several elements we are asking Grantees to consider when making decisions that will impact the delivery of services to homeless Veterans.

- What are the options to continue to have contact with Veterans currently enrolled with SSVF? (phones, laptop, telehealth systems, etc.)
- Will your Grant need to acquire the technology needed to ensure business can continue?
- How will your agency continue to enroll homeless Veterans? (phone, laptop, telehealth systems, etc.)
- What system will you have in place to ensure signatures are obtained for documentation when possible?
- Will there be local policies and procedures be developed or updated to address the expectations and functioning of the Grant during this crisis?
- Grantees will need to keep their SSVF Regional Coordinator updated with the plan to ensure services are being delivered and when changes are made.

2. Can Grantees accept verbal, email, or text consent and self-certifications if they are unable to get signed documents by the Veteran, landlord, etc.?

For Grantees who have been limited in their ability to meet face to face and/or complete community work in the traditional sense, it is allowable to obtain verbal or other interim forms of consent and self-certifications until signatures can be obtained. Grantees need to ensure there is clear documentation that consent was provided in the Veteran's file. It is recommended as part of any policies and procedures being developed, these case files are identified as needing signatures when possible.

3. What do Grantees do if our office is closed and we are not able to obtain copies of necessary documents for enrollments and recertifications?

The SSVF Program Office anticipates many Grantees will temporarily move to a telework or limited access office situation. In this circumstance, it will be important for Grantees to do their best to get appropriate documentation for the case file. This may be in a non-traditional format (pictures of documents sent via text, showing document via face time apps, etc.), collected at a later date, or require a more frequent use of self-certification. It will be prudent for Grantees to continue to work to protect Veteran privacy throughout service provisions.

4. What are the flexibilities given the SSVF Grantee is not currently able to assist the Veteran to search for housing?

The SSVF Program Office understands the current crisis will impact the ability for SSVF Grantees to assist with housing search and inspections. We are asking that Grantees consider all options and modalities for connecting Veterans with housing units and utilizing landlord relationships to negotiate ongoing housing placements. The Program Office is also encouraging Grantees to consider these placements carefully in regard to inspections. How might an inspection take place? Does the landlord understand unit habitability expectations and their obligation to make corrections at time of placement and throughout tenancy?

5. Should a Grantee agency have several staff sick with COVID -19 and need to suspend services what should we do?

As we all work through the uncertainty of the current crisis, we would ask that SSVF Grantees keep their Regional Coordinator updated on events that impact service delivery. The Program Office will defer to the Grantees local policies and procedures and crisis planning regarding infections disease/health related issues. The health and wellbeing of SSVF Grantee and Agency staff is important to everyone involved.

6. Are SSVF Grantees considered essential staff as it relates to quarantine orders?

The SSVF Program is a part of the Department of Veterans Affairs Healthcare System (VHA), and as a part of the VHA, it is expected that Grantees will continue to serve homeless Veterans. SSVF is part of the critical social service infrastructure that must remain open and available for those in need. This also needs to be done, and can be done, in a way that protects staff. Although SSVF is required to continue operations, grantees may use telework services and remote access to continue to serve Veteran families.

7. Can we use SSVF Funds to partially cover internet for staff that are working remotely. E.g.: each staff member expenses \$50 per month to offset use of their internet for work?

The SSVF Program Office recognizes as Grantees are required to work from alternative locations, there may be a need to ensure they have access to all necessary technology to ensure continued services are being provided. As such, some Grantees may find it necessary to assist staff with accessing internet services at their home. In those cases, Grantees are allowed to do so during this time of uncertainty. Grantees will need to ensure they have documented the need and the cost as reasonable.

8. As SSVF Grantees continue to provide services, are we able to provide hazard pay to staff?

The SSVF Program Office certainly appreciates the hard work and creativity that Grantees have right now. While we understand Grantees are doing what they can to serve Veterans, we also want everyone to do so in a safe manner. The Program Office has made numerous allowances for virtual work i.e. phone intakes and interviews, virtual housing inspections, virtual contacts with Veterans, etc. Because we are able to make these accommodations due to increasing risks to staff and stay at home orders in place, we are not requiring that Grantees meet face to face with Veterans, landlords, other providers, etc. Therefore, we are not able to accommodate requests to pay hazard pay at this time.

Emergency Housing Assistance and Expanded Emergency Housing Assistance

9. What happens if we utilize EHA for a vulnerable Veteran to be placed in a motel, but the Veteran does not have housing identified prior to this placement?

The SSVF Program Office understands the current crisis will impact the ability for SSVF Grantees to assist with housing search and inspections. Grantees will need to be strategic and forthcoming with Veterans about housing expectations and the limited time that this option is available to them. Grantees will also need to be strategic with the agreements they develop with motels around length of time, cost per night, and method of payment. Also, being mindful of any local or state laws around rentals, sheltering, and squatters' rights.

10. Are there any minimum requirements for motel/hotel leases beyond 45 days?

The SSVF Program Office advises Grantees to work with-in local and state laws to develop a lease that is agreed upon with the leasing agency. As with any SSVF Documentation requirements, the lease should identify the payee, the SSVF Participant as tenant, the terms of the agreement (dates of tenancy, amount due, etc.), and be current, and signed by both parties with dates as referenced in the SSVF Program Guide.

11. Is the new EHA Referral form replacing the existing SSVF EHA form?

The Emergency Housing Assistance referral form is intended for use by the VAMC, to refer those at high risk for COVID-19 to be placed in a motel/hotel for social distancing. The Emergency Housing Assistance form included in the SSVF Program Guide should continue to be utilized for other emergency housing needs separate from those being referred by the VAMC for high risk reasons.

12. If a Grantee is able to do 1-month leases with a partner landlord vs motel/hotel to address the needs of high-risk homeless Veterans, are they able to pay slightly higher than the fair market rent for that short time?

SSVF Program Office requires that Grantees determine rent reasonable. This can be accomplished by documenting details of comparable advertised rental units.

13. Can SSVF now pay for clients to enter Transitional Housing?

SSVF Grantees are now able to provide EHA to Veterans who are at high-risk for COVID-19 in addition to those already allowed. Grantees will not be paying for Veterans to enter GPD housing. SSVF Grantees may have requests to move a high-risk Veteran from a congregate GPD setting to a motel for safe social distancing.

14. What is the policy for spending EHA on a Veteran who would otherwise not be an appropriate fit for SSVF? For example, has a limited ability to take care of himself and may be better fit for assisted living or an RCF?

Veterans who require a higher level of care and are not able to live independently must not be placed in hotels. SSVF Grantees should work with the VAMC to find a more appropriate placement for these Veterans.

15. Are Grantees allowed to pay for damages to the motel/hotel?

The cost of damages to property is not an allowable expense under SSVF Regulations. We encourage Grantees to discuss this with the Veteran families they are placing and the motel/hotels they are working with. There have been a variety of ways Grantees have mitigated this issue. There are example Veteran/Motel agreements on the SSVF website that some have found useful. Some have worked out contracts/agreements that allow for a slightly higher rate for the room costs. Some have staff checking in with the motel/hotel and/or have someone on site daily to ensure issues are quickly addressed. Some have partnered with other community providers that are also placing homeless clients in motels that are allowed to pay damage costs. It is our expectation; these issues would be an exception to generally acceptable behaviors.

16. Are Grantees able to provide EHA assistance to homeless Veterans not eligible for VAMC services and who need to self-quarantine due to potential exposure COVID-19 prior to entering a congregate shelter?

When this happens Grantees would be allowed to assist with EHA for these Veterans. There are several considerations that Grantees must consider when providing this type of assistance.

- The Veteran must be homeless.
- If the Veteran is symptomatic and/or has tested positive, there needs to be a clear plan to manage any medical needs and check-ins. This can be done in coordination with other community providers as appropriate. Please note: The provision of medical/clinical services by SSVF Grantees continues to be outside of the scope of program administration and implementation.
- There needs to be clear communication and plan developed to provide services, and case management and housing placement.

17. Can a Grantee provide EHA assistance to a homeless Veteran with a plan to enter CRS/GPD program for services, but needs to self-quarantine prior to entry?

When this happens Grantees would be allowed to assist with EHA for these Veterans. There are several considerations that Grantees must consider when providing this type of assistance.

- The Veteran must be homeless.
- If the Veteran is symptomatic and/or has tested positive, there needs to be a clear plan to manage any medical needs and check-ins. This can be done in coordination with other community providers as appropriate. Please note: The provision of medical/clinical services by SSVF Grantees continues to be outside of the scope of program administration and implementation.
- There needs to be clear communication and plan developed to provide case management and/or follow up services.
- Ensure the transition plan into the CRS/GPD program is clear.

Homeless Prevention

18. Our local government has halted all evictions for 30 days/until April 1st, we are concerned this will impact our ability to negotiate with the landlords and/or the Veteran's ability to meet the "at imminent risk" criteria within our HP screening process.

While the SSVF Program Office anticipates the likelihood of an increased demand for Homeless Prevention (HP) Assistance in the coming months, it is hard to determine exactly what it will look like right now. We will expect Grantees will do their best to address the needs of those presenting for assistance. Some Grantees may find they will need to modify their HP score and/or reconsider how these households will be prioritized. Grantees should anticipate being in regular communication with their Regional Coordinators to seek guidance and support as we navigate this continuously changing crisis.

19. Are SSVF Grantees able to request a RRH Waiver given the increased demand for HP assistance?

It is hard to determine how long the COVID – 19 crisis and economic impact will last. Because of this, we are asking Grantees to do the best they can to meet the needs of eligible Veterans and remain in communication with your Regional Coordinators about your local needs. We may find after the immediate surge of needs, spending will balance back out for some communities, while others will see a need for HP services for several more months. The SSVF Program Office will take all of this into consideration as the fiscal year progresses and make accommodations accordingly.

General Housing Stability

20. Due to children not attending schools or daycares and a decrease or lack of household income and/or local food banks being closed we are seeing an increase in the need to provide emergency assistance for food. What if we need to spend more than the allowable \$500 for food items? What if we need to do this more than one time?

The SSVF Program Office would like to encourage Grantees to do their best to assist Veteran families with accessing food banks and SNAP benefits for long-term stability. However, there may be circumstances when food banks are not open, or the family is determined to not be eligible for SNAP benefits. In those instances, Grantees can assist with the purchase of food items for the household. Tracking of this expense and documentation of the need for expanded assistance would need to be clear. We would also expect Grantees would work with those Veteran families to develop a plan to address this need on a long-term basis.

This guidance has expanded to allow for the purchase of food for Veteran families up to the \$1500 GHS maximum.

21. Are we allowed to pay for alternative transportation (Uber/Lyft/Taxi) needs if a vulnerable Veteran needs assistance to get to medical appointments, mental health appointments, housing search, etc.?

SSVF Grantees will need to evaluate situations specific to the COVID - 19 environment and make appropriate decisions to ensure that you are taking the proper steps to meet community guidance to contain the potential of exposure. Should these decisions change the scope or method of current approved budgeted costs and require another avenue or mechanism to ensure the noted, they would be deemed allowable. Documentation and rationale should be noted for the costs and grantees should consider the most cost-effective ways to continue services.

22. Is it allowable for SSVF Grantees to have Veterans order groceries online/ahead and for the Grantee to utilize agency credit card to pay and reimburse the card from SSVF funding?

A: SSVF Grantees are allowed to assist Veterans with emergency food assistance. The Program Office expects that other resources to address food needs will be explored. In cases where there is not readily available, Veterans and Grantees are able to utilize online ordering options to purchase food. These are allowable costs for the Grantee under General Housing Stability funding.

23. If SSVF is serving a Veteran who has been diagnosed with COVID-19 and is in their home/motel under quarantine, can SSVF Grantees pay the deliver charge associated with food delivery because they are not allowed to leave?

The SSVF Program Office recognizes communities are at various stages of addressing the needs of those who are currently diagnosed with COVID-19. We would encourage Grantees to explore all options to address food needs for Veteran families prior to utilizing food delivery services. While this could be an allowable cost, it would not be considered an effective long-term solution to the food insecurity of those in quarantine. There may be other, more cost-effective methods of address food needs while Veterans are in this situation. On a limited and case by case basis, it may be more cost effective for Veterans in active quarantine to have a small refrigerator where they are able to store perishable food items, or a small microwave to prepare meals. Grantee will need to document the rational and need in the clients file.

24. Can SSVF funding be used to purchase toiletries, food, transport, bus passes?

SSVF Grantees are able to make these types of purchases on a case by case basis for Veteran families. There should be appropriate documentation about the need for these types of purchases. Also note, it is not allowable to purchase these types of items in bulk under SSVF Regulations.

Rental Assistance

25. Could SSVF Grantees provide additional rental assistance to those who have already exhausted all available TFA resources within the 2-year period?

Under the updated Stafford Act allowances, Grantees who provide services in a Federally Declared Disaster area/state, are allowed to serve Veteran families that have exhausted TFA within the last 2 years.

Those Grantees working within areas/states that have NOT been declared disasters at the Federal level area, must still follow the normal regulatory guidance's for the 2 year period.

26. Clients enrolled currently as HP, will stay but not receive rental help at this point, but when the eviction moratorium is lifted, we will be able to help if we have funding left? Even if it is a large amount?

The SSVF Program Office has advised Grantees, they should not take on new HP enrollments while there is an eviction moratorium at the local or state level. Grantees should continue to provide problem solving and Rapid Resolution conversations with those approaching for HP assistance. Grantees should NOT stop paying RRH or HP TFA rental assistance for Veterans on their current caseload during the eviction moratorium. Grantees should continue to provide the same levels of supports to their current caseloads that they would already be providing.

27. With states now have a Presidential Declaration of Disaster Areas/States, are Grantees allowed to waive any regulations related to rent and/or utilities?

Under the updated Stafford Act allowances, Grantees who provide services in a Federally Declared Disaster area/state, are allowed to waive the TFA limit for the number of months of rental assistance provided. Grantees in these areas/states are also allowed to waive the TFA limit for the number of months of utility assistance provided. Please keep in mind, this is waived during the current COVID-19 crisis. The SSVF Program Office will provide updates as they are available.

Those Grantees working within areas/states that have Not been declared disasters at the Federal level area, must still follow the normal regulatory guidance's for the 2-year period.

Other

28. Are SSVF Grantees supposed to track how many Veterans they are serving who are diagnosed with COVID – 19? Can Grantees pay for COVID testing?

The SSVF Program Office is not asking Grantees to track or report the number of COVID cases. We understand that this information is being tracked by local health departments and the CDC. SSVF Grantees are not allowed to pay for healthcare needs or testing, per regulatory standards.

29. Is it appropriate to continue to consider Returning Home cases?

Returning Home cases can continue to be approved on a case by case basis; however, we recommend that grantees review the CDC guidelines on travel in the United States before making this request to Regional Coordinators.

30. If “travel” was not part of our original grant are we still able to use TFA to pay for Ubers to get clients to apartment showings?

If Veterans are not able to access public transportation or other travel mechanisms safely, Grantees may provide transportation assistance. If this was not previously a part of your approved budget, you will need to make note, and ensure you request this budget modification at the next Program Change opportunity.

31. Are there still the 50% AMI income limits?

The SSVF Program Office is not able to waive the statutory income restrictions for SSVF Grantees.

32. Has the Program Office decided if Grantees with Shallow Subsidy grants are allowed to use some of that funding for EHA placements?

SSVF Program Office is advising that Grantees with Shallow Subsidy funding should not use that award to pay for EHA placements.

33. Is Rapid Resolution also on hold presently? I don't feel comfortable asking friends and family members to allow someone to stay with and have the liability that a Veteran may be exposed, or the family/friend exposed due to the living environment.

The SSVF Program Office continues to encourage SSVF Grantees to explore all options including possibilities for Veteran to stay with family or friends to avoid homelessness. This is likely a safe alternative to street homelessness or congregate living.

34. Are Grantees allowed to exceed the 50% spending cap for TFA payments.

Grantees are allowed to exceed the 50% spending during the COVID-19 crisis.

35. Are Grantees allowed to purchase gloves, masks, Clorox wipes for employees for personal protection while providing services?

Grantees are allowed to purchase these items for staff to safely continue to provide services.

36. Can I now use SSVF funds to purchase cell phones (like TracFone) and/or phone minutes for clients? We have a Veteran who is NOT eligible for a SNAP/Lifeline phone and is currently zero income.

The SSVF Program Office recognizes that COVID-19 has impacted the way Grantees are having to conduct business. Due to the movement to electronic communication platforms, the Program Office will allow the one-time purchase of a Prepaid Wireless phones (no more than \$50.00) for Veterans enrolled in SSVF. The purpose of the phone purchase is to communicate with the SSVF Providers to secure permanent housing. In alignment with this new guidance, the Program Office will also allow the purchase of Prepaid phone minutes, not to exceed 500 minutes. Grantees will be expected to make these purchases on a case by case basis and have a well-documented need.

HUD-VASH Coordination

37. Is there new requirement that SSVF Case Managers perform housing inspections for HUD-VASH participants?

SSVF Grantees are not required to conduct inspections for HUD-VASH referrals. We encourage some type of habitability inspection to ensure that the PHA HQS will pass when operations resume. This is optional and can be conducted virtually by the HUD-VASH team or by the SSVF Grantee.

38. If a HUD-VASH Veteran moved into the unit before being enrolled into SSVF because the landlord allowed, client was sleeping outside the unit. Can we still pay the deposit?

The SSVF Program Office is requesting that Grantees carefully consider the current environment and need to address safety first. During this time of crisis, the Grantee could support an HP enrollment to provide the security deposit in this circumstance.

39. Can we serve more than 10% of Veterans served with HUD-VASH?

The SSVF Program Office does not have a cap on the percentage of HUD-VASH Veterans that can be served.

40. If SSVF pays rental cost to move a Veteran into their unit with their HUD-VASH voucher, will HUD-VASH still provide that ongoing case management?

During the COVID-19 crisis, SSVF Grantees are allowed to pay rental assistance for a HUD-VASH unit that is awaiting a PHA inspection. Grantees are allowed to continue to pay rental assistance for that unit until the PHA funding begins. During that time the HUD-VASH Program will continue to provide Case Management services.

41. Do we keep Veterans that are housed with HUD-VASH vouchers enrolled or should we discharge them per normal protocol once housed?

Grantees can begin to transition HUD-VASH Veterans out of SSVF after they begin receiving the Housing Assistance Payments from the PHA.